

**To:** Laidlaw, Tina[Laidlaw.Tina@epa.gov]; Suplee, Mike[msuplee@mt.gov]  
**From:** Blend, Jeff  
**Sent:** Tue 8/9/2016 6:29:06 PM  
**Subject:** RE: TD 14: Montana Communities - Updated Calculations

The documents look good on the Secondary Scores for the eight towns that might be able to meet nutrient criteria.

Several comments:

- 1) It looks like Boulder's calculation of the local tax burden secondary measure is correct
- 2) Are we sure that the existing wastewater costs for Boulder include the new WWTP that should have been completed in Dec of 2015?
- 3) If Grass Range only released once in five years, couldn't they just limit releases or dilute rather than upgrade (I may not understand what 'discharge' means? "The facility is operated as a controlled release and, during the period of June 2006 to April 2011, discharged only once, in June 2008." Also, it is a lagoon system, so why is it being looked at here?
- 4) The population for Grass Range is 110 (local estimate of CEIC), not 164, but the Local Tax Secondary Score does not change enough to affect is being a 2.0
- 5) The impacts on Havre are uncertain, so that would indicated a Widespread test (giving Havre the benefit of the doubt).
- 6) Roundup has lagoons, but are not excluded under a general permit
- 7) In the case of a town like Sun Prairie, "Based on recent discharge monitoring report (DMR) data, nutrients in the facility's discharges have been as high as 19.4 milligrams per liter (mg/L) total nitrogen (TN) and 5.16 mg/L total phosphorus (TP). Future average monthly limits for the facility would be 15.3 mg/L TN and 1.3 mg/L TP. Therefore, the facility could require upgrades to comply with the new limits." Why not just optimize their system rather than spending millions upgrading (at least for TN)?
- 8) Sun Prairie may be able to meet criteria.
- 9) Vaughn should go on to a Widespread test
- 10) The bond rating was not available for most of these towns.

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**From:** Laidlaw, Tina [<mailto:Laidlaw.Tina@epa.gov>]  
**Sent:** Tuesday, August 2, 2016 2:48 PM  
**To:** Suplee, Mike; Blend, Jeff  
**Subject:** FW: TD 14: Montana Communities - Updated Calculations

Second attachment.

**From:** Laidlaw, Tina  
**Sent:** Tuesday, August 02, 2016 2:27 PM  
**To:** Mike Suplee <[msuplee@mt.gov](mailto:msuplee@mt.gov)>; 'Blend, Jeff' <[jblend@mt.gov](mailto:jblend@mt.gov)>  
**Cc:** Sengco, Mario <[Sengco.Mario@epa.gov](mailto:Sengco.Mario@epa.gov)>  
**Subject:** FW: TD 14: Montana Communities - Updated Calculations

Mike and Jeff,

Attached are the revised secondary score analyses completed for the 8 communities. See the email from TetraTech below. Please take a look at this information and let us know if you have any comments/ suggested changes. Once we address your comments, we will proceed with finalizing the information.

Also, I attached the draft report the describes the overall WQBEL analysis. Mike, I think you were looking for this document or was it another one? The title still says “draft” but I’ve asked TetraTech to review it b/c I think we can proceed with finalizing it.

Talk to you tomorrow.

Tina

**From:** Blandford, Kelly [<mailto:Kelly.Blandford@tetrattech.com>]  
**Sent:** Thursday, June 30, 2016 3:26 PM  
**To:** Laidlaw, Tina <[Laidlaw.Tina@epa.gov](mailto:Laidlaw.Tina@epa.gov)>; Gardner, Thomas <[Gardner.Thomas@epa.gov](mailto:Gardner.Thomas@epa.gov)>  
**Cc:** Sengco, Mario <[Sengco.Mario@epa.gov](mailto:Sengco.Mario@epa.gov)>  
**Subject:** TD 14: Montana Communities - Updated Calculations

Tom, Mario, Tina,

Please find attached the revised substantial impact analyses for eight facilities (including Boulder) and the spreadsheets with the revised secondary scores from Abt Associates. The write-ups and worksheets for each facility are separate, and the results for all facilities are provided in a summary table (word document). Please note, the worksheets and write-ups for each facility are contained in the attached zip file. You will need to save the file and change the file extensions from “.piz” to “.zip” before opening. Let me know if you have trouble converting the zip folder or opening the files.

Please let me know if you have any questions. As always we can make changes as necessary and are happy to walk through things on a call as well.

Thank you,

Kelly

**Kelly Blandford** | Environmental Scientist

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